

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 13  
 )  
CHESTER PAUL RAMAGOS ) CASE NO. 17-69050-LRC  
DANA LATRICE RAMAGOS )  
 )  
DEBTORS. )

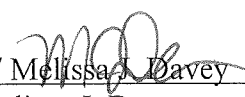
**CHAPTER 13 TRUSTEE'S  
SUPPLEMENTAL OBJECTION TO CONFIRMATION  
& MOTION TO DISMISS**

COMES NOW Melissa J. Davey, Chapter 13 Trustee, and objects to confirmation of the plan and files this motion to dismiss under 11 U.S.C. Section 1307(c), for cause, including the following reasons:

1. The Trustee restates and incorporates by reference the objections to Confirmation previously filed.
2. The Chapter 13 schedules fail to include post-petition debts owed to Ashley Stewart and on Debtors' credit card, in violation of Bankruptcy Rule 1007(a) (1) and 11 U.S.C. Sections 1325(a)(3) and 1325(a)(7).
3. Debtors may not be contributing all projected disposable income to creditors, as the Debtors' Schedules fails to reflect Debtor/Wife's employment income with Parsec, in violation of 11 U.S.C. Sections 1325(a)(3), 1325(a)(7), and 1325(b).
4. The Chapter 13 Trustee requests documentation to establish that Debtors' employment tax withholdings are sufficient to pay Debtors' anticipated income tax liability in order to ensure that the Plan complies with 11 U.S.C. Section 1325(a)(6).
5. The Chapter 13 Trustee is unable to administer the provisions in the Plan regarding attorneys' fees.
6. The Form 122C-1 filed in this case fails to disclose all of the Debtors' income in the six (6) months preceding the filing of this case, in violation of U.S.C. Sections 521(a) and 1325(b). The CMI form erroneously excludes Debtor/Wife's wage income.
7. The Chapter 13 Trustee requests a copy of Debtors' filed 2017 federal income tax returns in order to determine whether the Chapter 13 Plan complies with 11 U.S.C. Sections 1325(a)(3), (a)(4), (a)(6) and/or (b)(1)(B).

8. Debtors have retained possession and/or use of credit card(s) without court approval in violation of 11 U.S.C. Sections 1305(c), 1325(a)(1), 1325(a)(3), 1325(a)(7), and 364. Debtor/Wife testified that she obtained an Ashley Madison credit card post-petition. Debtor/Husband testified that he uses a corporate credit card.

WHEREFORE, Trustee moves this Honorable Court to inquire into the above objections at the separately scheduled and noticed confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case, and for such other and further relief that this Court deems just and proper.

  
\_\_\_\_\_  
/s/ Melissa J. Davey

Melissa J. Davey  
Chapter 13 Trustee  
GA Bar No. 206310

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|                          |   |                        |
|--------------------------|---|------------------------|
| IN RE:                   | ) | CHAPTER 13             |
| Chester Paul Ramagos and | ) |                        |
| Dana Latrice Ramagos,    | ) | CASE NO.: 17-69050-LRC |
|                          | ) |                        |
| DEBTORS.                 | ) |                        |

17-69050-LRC

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served:

DEBTOR(S):

Chester Paul Ramagos  
Dana Latrice Ramagos  
1413 Preston Park Dr  
Duluth, GA 30096


DEBTOR(S) ATTORNEY:

THE SEMRAD LAW FIRM, LLC  
STERLING POINT II  
SUITE 201  
303 PERIMETER CENTER NORTH  
ATLANTA, GA 30346

in the foregoing matter with a copy of this Objection to Confirmation & Motion to Dismiss by depositing in the United States Mail a copy of same in a properly addressed envelope with adequate postage thereon.

Wednesday, May 30, 2018

/s/

  
\_\_\_\_\_  
Melissa J. Davey  
GA Bar No. 206310  
Chapter 13 Trustee  
260 Peachtree Street, NW, Suite 200  
Atlanta, GA 30303  
Telephone: 678-510-1444  
Facsimile: 678-510-1450